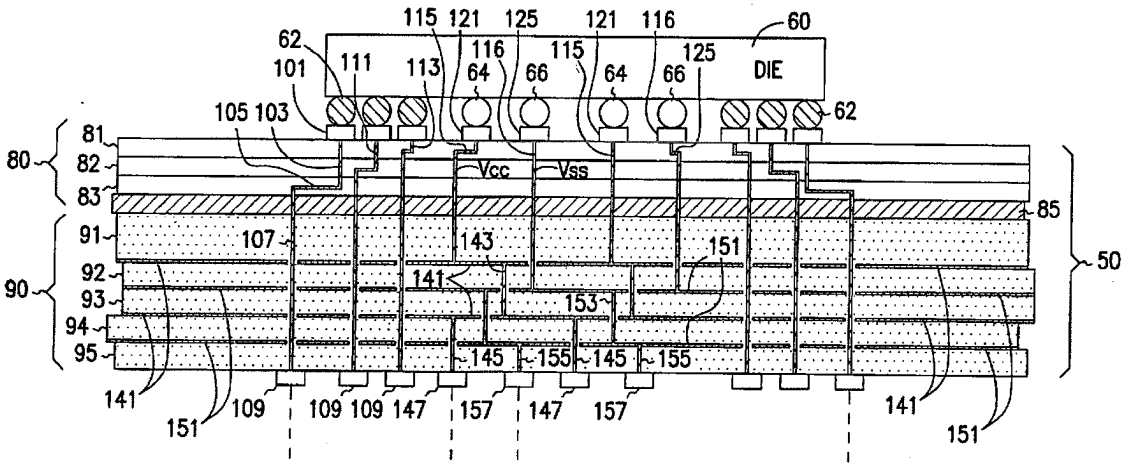
Remarks

The Office Action dated February 7, 2008 lists the following rejection: claims 1-6 and 11 stand rejected under 35 U.S.C. § 102(e) over Chakravorty *et al.* (U.S. Patent Pub. 2004/0238942). Claims 7-10 are objected to as being dependent upon a rejected base claim but would be allowable if rewritten.

In response to the potential allowability of claims 7-10, Applicant has rewritten claims 7-8 and 10 to be in independent form. Claim 9 depends from claim 8. Thus, Applicant submits that, as is consistent with the instant Office Action, claims 7-10 are in condition for allowance over the cited references.

Applicant respectfully traverses the § 102(e) rejection of claims 1-6 and 11 because the cited portions of the Chakravorty reference do not correspond to the claimed invention which includes, for example, aspects directed to the bond and contact pads for voltage supply and ground connections being located to provide a direct path from the contact pads at the second side of the substrate to the corresponding bond pads of the semiconductor device. The Office Action erroneously asserts that Chakravorty teaches that there is a direct path from solder balls 64 and 66 of die 60 to lands 147 and 157 on the bottom surface of substrate 50. *See, e.g.,* Figure 3, the relevant part of which is reproduced below.



Instead Chakravorty teaches that decoupling capacitors (capacitive plates 141 and capacitive plates 142) are embedded in substrate 60 on the paths from solder balls 64 and 66 to lands 147 and 157. *See, e.g.,* Paragraphs 0019, 0037, 0041 and 0070. Chakravorty's solder balls

64 and 66 are decoupled from lands 147 and 157 by these capacitors. Thus, Chakravorty does not teach that the bond and contact pads for the voltage supply and ground connections are located to provide a direct path from the contact pads at the second side of the substrate to the corresponding bond pads of the semiconductor device as in the claimed invention. Accordingly, the § 102(e) rejection of claims 1-6 and 11 is improper and Applicant requests that it be withdrawn.

Applicant further traverses the § 102(e) rejection of claim 2 because the Office Action fails to address aspects of the claimed invention directed to certain bond pads of the second portion (which are defined for voltage supply) being provided with ESD protection structures while other ones of the bond pads of the second portions do not have ESD protection structures. Specifically, the Office Action does not assert correspondence between these aspects of the claimed invention and any portion of the Chakravorty reference. Applicant submits that the cited portions of Chakravorty do not make any mention of ESD protection structures. Accordingly, the § 102(e) rejection of claim 2 is improper and Applicant requests that it be withdrawn.

Applicant notes that minor amendments have been made to claims 1 and 11 to improve readability. These amendments are not being made to overcome the rejection raised by the Office Action, which fails for the reasons discussed above.

In view of the remarks above, Applicant believes that each of the rejections/objections has been overcome and the application is in condition for allowance. Should there be any remaining issues that could be readily addressed over the telephone, the Examiner is asked to contact the agent overseeing the application file, Peter Zawilski, of NXP Corporation at (408) 474-9063.

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